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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL,

Petitioners,

vs.

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715,

Respondent.

Case No: 5:07-CV-05158-JF

[PROPOSED] ORDER GRANTING  
STANFORD HOSPITAL AND  
CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION  
TO COMPEL FURTHER RESPONSES  
TO DISCOVERY REQUESTS  
PROPOUNDED TO LOCAL 715

Date: August 27, 2008  
Time: 9:30 A.M.  
Dept: Courtroom 4, 5th Floor

Judge: Hon. Jeremy Fogel  
Magis. Judge: Hon. Richard Seeborg

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner and Counter-  
Respondent,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents and Counter-  
Petitioners.

Case No: 5:08-CV-00213-JF

Judge: Hon. Jeremy Fogel

[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL FURTHER RESPONSES TO DISCOVERY REQUESTS  
PROPOUNDED TO LOCAL 715

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01727-JF

Judge: Hon. Jeremy Fogel

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[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL FURTHER RESPONSES TO DISCOVERY REQUESTS  
PROPOUNDED TO LOCAL 715

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

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2 The Motion to Compel Further Responses To Discovery Requests Propounded to  
3 Local 715 (the "Motion") brought by Stanford Hospital And Clinics and Lucile Packard  
4 Children's Hospital (the "Hospitals"), in the above-referenced related cases came on for  
5 hearing before the above-captioned Court, the Honorable Richard Seeborg presiding, on  
6 \_\_\_\_\_, 2008.

7 The Court, having considered the pleadings in this matter, and all papers submitted  
8 in support of, and in opposition to, said motion, and having heard the argument of  
9 counsel, and good cause appearing therefor, hereby **GRANTS** the Motion in its entirety.

10 Service Employees International Union, Local 715 ("Local 715") shall provide  
11 full and complete responses to request for production numbers 1-14, 17-21, 27-28, 31, 34,  
12 37, 40, 42-45, 48-53, and 56 in each case in accordance with Federal Rules of Civil  
13 Procedure. Local 715's responses shall include electronically stored information that is  
14 responsive to the requests, including website-related information. Any withholding of  
15 responsive information on the basis of a privilege or work product protection shall be  
16 supported by a privilege log that identifies the documents withheld on a document by  
17 document basis, including the following information:

- 18 1) the Bates number of the document;
- 19 2) the date of the document;
- 20 3) the specific individual author/s of the document;
- 21 4) the specific individual recipient/s of the document;
- 22 5) a precise document description;
- 23 6) the specific privilege/s claimed; and
- 24 7) the present location of the document.

25 Local 715 shall not withhold responsive information not subject to a privilege or work  
26 product protection.

27 Local 715 is ordered to serve responsive documents on or before the tenth

1 business day following the date of this order.

2 It is further ordered that Local 715 shall pay the Hospitals' reasonable expenses  
3 incurred in making this motion, including attorneys fees, in the amount of  
4 \$\_\_\_\_\_.

5 IT IS SO ORDERED.

6  
7 DATE:  
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11 HON. RICHARD SEEBORG  
12 MAGISTRATE JUDGE OF THE  
13 UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF  
15 CALIFORNIA, SAN JOSE DIVISION  
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